



MANCHANDA LAW OFFICE PLLC
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NEW YORK, NEW YORK 10005
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WWW.MANCHANDA-LAW.COM

February 2, 2019

VIA ELECTRONIC AND US MAIL

Judge Paul Gardephe
US District Judge
40 Foley Square
New York NY 10007

**RE: NOTICE OF PROTEST REGARDING FORGERY/FRAUD IN SETTLEMENT
DOCUMENT, REINSTATEMENT OF SANCTIONS/CONTEMPT REQUEST
CASE DOCKET 1:18-CV-11092-PGG; MANCHANDA V MATTIES ET AL**

Dear Judge Paul Gardephe:

This Letter Motion is being submitted in support of Plaintiff's Protest that the Settlement Document uploaded to ECF yesterday February 1, 2019 by Opposing Counsel Corey Cohen withdrawing Plaintiff's claims was illegally and unethically forged and altered without the consent of the Plaintiff by opposing counsel, defendants and possibly even with the unethical and illegal assent and collusion of Plaintiff's own lawyer Dominic Sarna.

Undersigned Plaintiff originally signed, notarized and executed a Withdrawal of Claims letter dated January 25, 2019 wherein he mandated that (1) the only way he would agree would be if Douglas Senderoff was a signatory and (2) that no other pleadings/answers/motions would follow this withdrawal of claims letter. (**Exhibit A**)

However, not only did opposing counsel reject the second portion regarding additional filings (which Plaintiff reluctantly agreed to change (**Exhibit B**), but apparently yesterday on February 1, 2019, before uploading to ECF, opposing counsel illegally and unethically removed Douglas Senderoff from Plaintiff's signed and notarized document, without Plaintiff's knowledge or consent (**Exhibit C**).

This is the height of fraud and criminality in a federal litigation proceeding, and demands to be both called out and the responsible parties aggressively punished.

This is part and parcel, and very emblematic of, the difficulties that Plaintiff has experienced with the defendants and their lawyers since the beginning of this action, and highlights their overall criminality, collusion, and unethical conduct since this is all began around October 5, 2018, 4 months ago.

To that end Plaintiff hereby (1) protests against and rejects this forged/alterd withdrawal of claims stipulation, (2) demands sanctions/contempt against the responsible parties/defendants committing this forgery/fraud, and (3) wishes to continue this federal litigation aggressively and to its final and logical conclusion, without dismissing any of his claims, against any of the defendants.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rahul C. Manchanda".

Rahul Manchanda, Esq.

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
RAHUL MANCHANDA,

Plaintiff,

– against –

NICOLE MATTIES, NICOLA SHAPIRO, DOUGLAS :
SENDEROFF, ROGER BLANK, AARON MINC, :
DANIEL POWELL, MATT O’BUCK, SHARIE O’BUCK, :
KATE BOSE, NEW YORK FBI, NYPD, JOE HENDRIX, :
ANDRE DE CASTRO, JAMIE WOZMAN, MARK :
ANESH, COREY COHEN, A. MICHAEL FURMAN, and :
PAULA ASHCRAFT,

Defendants.
----- X

No. 18 Civ. 11092 (PGG)

STIPULATION OF
DISMISSAL WITH
PREJUDICE

WHEREAS, on or about October 14, 2018, Plaintiff Rahul Manchanda (“Plaintiff”) filed a complaint in the Supreme Court of New York, County of New York, Index No. 101501/2018 (“NYS Supreme Court Action”), naming Nicole Matties, Nicola Shapiro, Douglas Senderoff, Roger Blank, Aaron Minc, Daniel Powell, Matt O’Buck, and Sharie O’Buck as defendants;

WHEREAS, on or about October 24, 2018, Plaintiff filed a second amended complaint in NYS Supreme Court Action, adding the Federal Bureau of Investigation (improperly named as NY FBI) (the “FBI”) and the NYPD as defendants;

WHEREAS, on or about October 31, 2018, Plaintiff filed a third amended complaint in the NYS Supreme Court Action, adding Joe Hendrix and Andre de Castro as defendants (the “Third Amended Complaint”);

WHEREAS, on or about November 28, 2018, the FBI removed the Third Amended Complaint to the Southern District of New York, No. 18 Civ. 11092 (the "Federal Action"), and filed a Notification of Removal in the NYS Supreme Court Action;

WHEREAS, on or about November 28, 2018, Plaintiff filed a Fourth Amended Complaint (Dkt. Nos. 2, 5, 6) in the Federal Action, which Plaintiff had filed in the NYS Supreme Court Action, adding Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, and Paula Ashcraft as defendants (the "Fourth Amended Complaint");

WHEREAS, counsel for Defendants FBI, Roger Blank, Aaron Minc, Daniel Powell, Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, and Douglas Senderoff have appeared in the Federal Action;

WHEREAS, no party hereto is an infant or incompetent person for whom a committee or guardian has been appointed;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, his counsel, and counsel for Defendants FBI, Roger Blank, Aaron Minc, Daniel Powell, Jamie Wozman, Mark Anesh, Corey Cohen, A. Michael Furman, and Douglas Senderoff that:

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff voluntarily dismisses the Federal Action with prejudice, which includes all underlying complaints filed in the NYS Supreme Court Action, with each party to bear its own fees and costs, void if any parties file

any further pleadings or motions after this Notice of Motion dated January 25, 2019.

2. This stipulation may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement. Facsimiles of signatures shall constitute acceptable, binding signatures for purposes of this agreement.

DOMINIC SARNA, ESQ.

By: _____

Dominic Sarna, Esq.
Attorneys for Plaintiff
RAHUL MANCHANDA
1539 Franklin Avenue, Suite 200
Mineola, New York 11501
(516) 491-0443
saranesq@aol.com

FURMAN KORNFELD & BRENNAN LLP

By: _____

Corey M. Cohen, Esq.
Attorneys for Defendants
ROGER BLANK, COREY COHEN, and
A. MICHAEL FURMAN
61 Broadway, 26th Floor
New York, NY 10006
(212) 867-4100
FKB File No.: 321.029
ccohen@FKBLLaw.com

LEWIS BIRSBOIS BISGAARD &
SMITH, LLP

By: _____

Jamie R. Wozman, Esq.
Attorneys for Defendants
AARON MINC, DANIEL POWELL,
JAMIE WOZMAN, and MARK ANESH
77 Water Street, 21st Floor
New York, New York 10005
(212) 232-1346
Jamie.Wozman@LewisBrisbois.com

GEOFFREY S. BERMAN
UNITED STATES ATTORNEY FOR THE
SOUTHERN DISTRICT OF NEW YORK

By: _____

Danielle Levine, Esq.
Attorneys for Defendant
THE FEDERAL BUREAU OF
INVESTIGATION
86 Chambers Street, 3rd Floor
New York, New York 10007
(212) 637-2689
Danielle.Levine@usdoj.gov

By: _____

Douglas Senderoff, MD
461 Park Avenue South
New York, New York 10016

I, Plaintiff Rahul Manchanda, have reviewed the instant Stipulation of Dismissal with Prejudice and have had an opportunity to discuss the same with my attorney, Dominic Sarna. I agree to all language herein, including the agreements set forth in Paragraphs 1 and 2 of this Stipulation of Dismissal with Prejudice.



By: Plaintiff Rahul Manchanda

Sworn to before me this
25 day of January, 2019



Notary Public

DAVID HAMILTON
NOTARY PUBLIC-STATE OF NEW YORK
No. 01HA6352652
Qualified in Queens County
My Commission Expires 01-03-2021

SO ORDERED:

Honorable Paul G. Gardephe

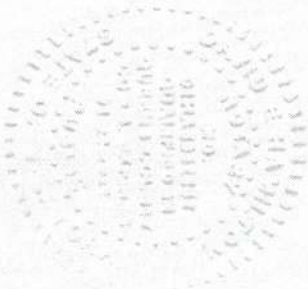


EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAHUL MANCHANDA,

Plaintiff,

– against –

NICOLE MATTIES, NICOLA SHAPIRO, DOUGLAS :
SENDEROFF, ROGER BLANK, AARON MINC, :
DANIEL POWELL, MATT O’BUCK, SHARIE O’BUCK, :
KATE BOSE, NEW YORK FBI, NYPD, JOE HENDRIX, :
ANDRE DE CASTRO, JAMIE WOZMAN, MARK :
ANESH, COREY COHEN, A. MICHAEL FURMAN, and :
PAULA ASHCRAFT,

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No. 18 Civ. 11092 (PGG)

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2. This stipulation may be executed in counterparts, each of which constitutes an original and all of which constitutes one and the same agreement. Facsimiles of signatures shall constitute acceptable, binding signatures for purposes of this agreement.

DOMINIC SARNA, ESQ.

FURMAN KORNFELD & BRENNAN LLP

By:

Dominic Sarna, Esq.
Attorneys for Plaintiff
RAHUL MANCHANDA
1539 Franklin Avenue, Suite 200
Mineola, New York 11501
(516) 491-0443
saranesq@aol.com

By:

Corey M. Cohen, Esq.
Attorneys for Defendants
ROGER BLANK, COREY COHEN, and
A. MICHAEL FURMAN
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GEOFFREY S. BERMAN
UNITED STATES ATTORNEY FOR THE
SOUTHERN DISTRICT OF NEW YORK

By:

Jamie R. Wozman, Esq.
Attorneys for Defendants
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JAMIE WOZMAN, and MARK ANESH
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By:

Danielle Levine, Esq.
Attorneys for Defendant
THE FEDERAL BUREAU OF
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Danielle.Levine@usdoj.gov

By:


Douglas Senderoff, MD
461 Park Avenue South
New York, New York 10016

I, Plaintiff Rahul Manchanda, have reviewed the instant Stipulation of Dismissal with Prejudice and have had an opportunity to discuss the same with my attorney, Dominic Sarna. I agree to all language herein, including the agreements set forth in Paragraphs 1 and 2 of this Stipulation of Dismissal with Prejudice.



By: Plaintiff Rahul Manchanda

Sworn to before me this
25 day of January, 2019

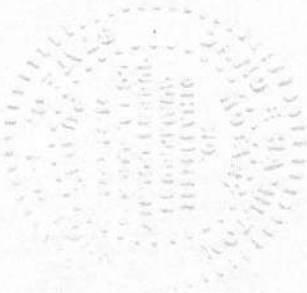


Notary Public

DAVID HAMILTON
NOTARY PUBLIC-STATE OF NEW YORK
No. 01HA6352652
Qualified in Queens County
My Commission Expires 01-03-2021

SO ORDERED:

Honorable Paul G. Gardephe



Subject: Re: Manchanda. Stipulation of Discontinuance with Prejudice v2.docx
From: "RAHUL MANCHANDA ESQ." <rdm@manchanda-law.com>
Date: 1/25/2019, 2:11 PM
To: Dominic Sarna <sarnaesq@aol.com>
CC: "Wozman, Jamie" <Jamie.Wozman@lewisbrisbois.com>
BCC: rdm@manchanda-law.com

Dominic:

Attached version 2.

Remember no further pleadings, motions etc in this case.

Kind regards,

--

Rahul D. Manchanda, Esq.
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Suite 8207
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Tel: (212) 968-8600
Mob: (646) 645-0993
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web: www.manchanda-law.com/MT_Rahul.html

Ranked amongst Top Attorneys in the United States by Newsweek Magazine in 2012 and 2013.

Martindale Hubbell Client Champion Silver 2017 Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <http://www.manchanda-law.com/ClientTestimonials.html>

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On 1/25/2019 1:58 PM, RAHUL MANCHANDA ESQ. wrote:

Dominic:

Ok Dominic so put a line through that void language.

Or I can do it and I will initial it.

Whatever you want.

Kind regards,

--

Rahul D. Manchanda, Esq.
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On 1/25/2019 1:41 PM, RAHUL MANCHANDA ESQ. wrote:

Dominic:

Please see the attached as discussed.

Kind regards,

--

Rahul D. Manchanda, Esq.
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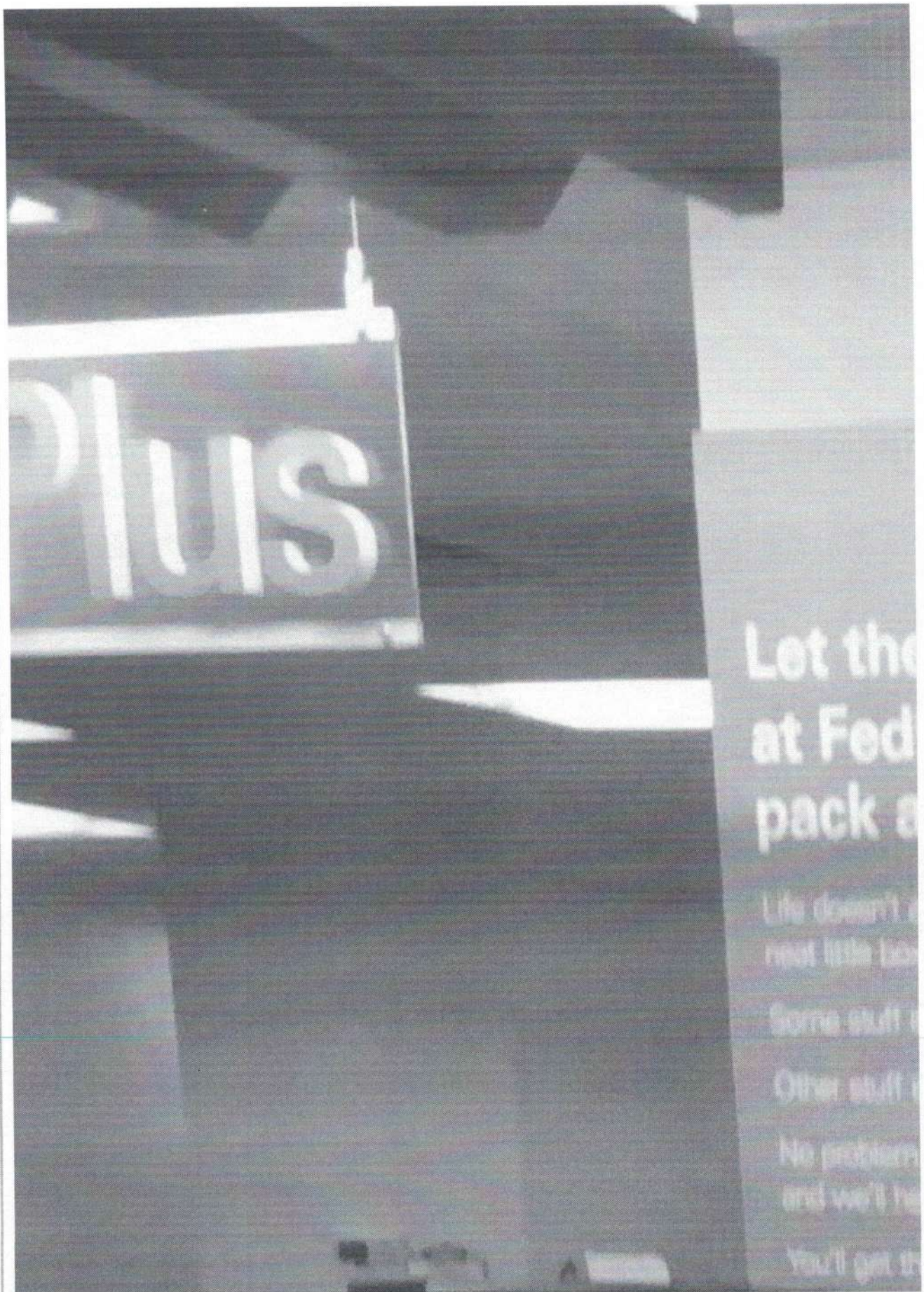
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On 1/25/2019 1:17 PM, Rahul Manchanda wrote:

Dominic/

Just got to fedex and they don't have a notary. Need to find another place nearby. Bear with me for another 15-30 mins after 1:30 pm.



Kind regards,

Rahul D. Manchanda, Esq.

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30 Wall Street, 8th Floor

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On Jan 25, 2019, at 12:46 PM, RAHUL MANCHANDA ESQ. <rdm@manchanda-law.com> wrote:

Dominic:

Also I do not see either Senderoff on this document.

Kind regards,

--

Rahul D. Manchanda, Esq.
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On 1/25/2019 12:45 PM, RAHUL MANCHANDA ESQ. wrote:

Dominic Sarna:

I will get this thing signed and notarized but I need until 1:30 PM because I'm still at home and I need to print it out and bring it to notary at Columbus Circle, scan it and then send to you all.

Remember what we discussed that if I sign this it's void if any one of these people

file any additional pleadings or motions in this case, other than their ECF "Notice of Motion."

I want to be done with this just like they do.

This is our "meeting of the minds."

Kind regards,

--

Rahul D. Manchanda, Esq.
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On 1/25/2019 12:34 PM, Dominic Sarna wrote:

Here is attachment. Jamie said she must receive it signed by you and
notarized before 1 pm today.

Sent from my iPhone

— Attachments:

STIPULATION OF DISMISSAL WITH PREJUDICE 2.pdf

1.2 MB

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK.

RAHUL MANCHANDA,

Plaintiff,

No. 18 Civ. 11092 (PGG)

- against -

NICOLE MATTIES, NICOLA SHAPIRO, DOUGLAS
SENDEROFF, ROGER BLANK, AARON MINC,
DANIEL POWELL, MATT O'BUCK, SHARIE O'BUCK,
KATE BOSE, NEW YORK FBI, NYPD, JOE HENDRIX,
ANDRE DE CASTRO, JAMIE WOZMAN, MARK
ANESH, COREY COHEN, A. MICHAEL FURMAN, and
PAULA ASHCRAFT,

Defendants.

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Page 1 of 4

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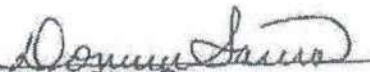
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DOMINIC SARNA, ESQ.

By:


Dominic Sarna, Esq.
Attorneys for Plaintiff
RAHUL MANCHANDA
1539 Franklin Avenue, Suite 200
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(516) 491-0443
sarnacsq@aol.com

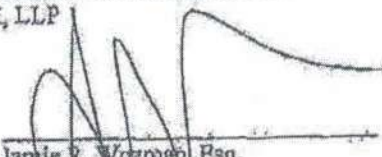
FURMAN KORNFIELD & BRENNAN LLP

By:


Corey M. Cohen, Esq.
Attorneys for Defendants
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LEWIS BIRSBOIS BISGAARD &
SMITH, LLP

By:

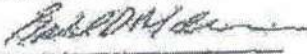

Jamie R. Wozman, Esq.
Attorneys for Defendants
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UNITED STATES ATTORNEY FOR THE
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By: Plaintiff Rahul Manchanda

Sworn to before me this
25 day of January, 2019


Notary Public

DAVID HAMILTON
NOTARY PUBLIC-STATE OF NEW YORK
No. QTHA8352552
Qualified in Queens County
My Commission Expires 01-03-2021

SO ORDERED:

Honorable Paul G. Gardephe